

OPEN MEETING

MEMORANDUM

TO: THE COMMISSION

FROM: Utilities Division

DATE: March 29, 2022

RE: IN THE MATTER OF THE APPLICATION OF ARIZONA PUBLIC SERVICE COMPANY FOR A HEARING TO DETERMINE THE FAIR VALUE OF THE UTILITY PROPERTY OF THE COMPANY FOR RATEMAKING PURPOSES, TO FIX A JUST AND REASONABLE RATE OF RETURN THEREON, TO APPROVE RATE SCHEDULES DESIGNED TO DEVELOP SUCH RETURN. (DOCKET NO. E-01345A-19-0236)

SUBJECT: STAFF'S RECOMMENDATION REGARDING ARIZONA PUBLIC SERVICE COMPANY'S CUSTOMER EDUCATION AND OUTREACH PLAN

INTRODUCTION

Enclosed are the Commission Staff's memorandum and proposed order for Staff's Recommendation Regarding Arizona Public Service Company's Customer Education and Outreach Plan (Docket No 01345A-19-0236). This is only a Staff recommendation to the Commission; it has not yet become an order of the Commission. The Commission can decide to accept, amend or reject Staff's proposed order.

You may file comments to the recommendation(s) of the proposed order by efilings at <https://efiling.azcc.gov/> or filing an original and the appropriate number of copies in accordance with the Filing Requirements available at <http://azcc.gov/hearing/docket-control-center-filing-requirements>, with the Commission's Docket Control on or before: **April 12, 2022**.

This matter may be scheduled for Commission deliberation at its Open Meetings scheduled **April 12, 2022, and April 13, 2022**.

If you have any questions about this matter, please contact Matt Connolly of our Staff at (602) 542-0856 or Elijah Abinah, Director, at (602) 542-6935.

BACKGROUND

Pursuant to Decision No. 76295, dated August 18, 2017, in Docket No. E-01345A-16-0036, the Arizona Corporation Commission ("ACC" or "Commission") approved a Customer Education and Outreach Plan ("CEOP") for Arizona Public Service Company ("APS" or

“Company”) to educate its customers on a new, modernized rate. Based on feedback received by the Commission, Utilities Division Staff (“Staff”) was directed to investigate the implementation of the CEOP to determine whether the dissemination of the information was delivered by APS to its customers in a reasonable and comprehensive manner. Pursuant to Decision No. 77270, dated June 27, 2019, in Docket No. E-01345A-19-0003, the Commission found that “[i]t is reasonable for APS to fund and organize along with the assistance of an independent third-party consultant, a stakeholder group to collaborate and suggest better ways to communicate the impact of changes and adjustor mechanisms to residential customers, including more effective ways to educate customers on rate plans and ways to cut back on energy usage” and “...that APS be required to file a new rate case no later than October 31, 2019.”

The Commission, in Decision No. 78317, issued on November 9, 2021, required APS to work collaboratively with Staff, the Residential Utility Consumer Office (“RUCO”), and any other interested parties on a CEOP that addresses the recommendations made in the following four consultant reports that examined the various aspects of APS’s customer education efforts.

- *Rate Review and Customer Outreach Program Evaluation of Arizona Public Service Company* (“Overland Report”) filed June 4, 2019, in Docket No. E-01345A-19-0003.
- *An Evaluation of Arizona Public Service Customer Education Plan and Its Implementation* (“Alexander Report”) filed May 19, 2020, in Docket Nos. E-01345A-19-0003 and E-01345A-19-0236.
- *Analysis of the APS Rate Comparison Tools* (“Energytools Report”) filed August 20, 2020, in Docket No. E-01345A-19-0003.
- *Review of the 2017 Customer Education and Outreach Plan & Response to the Plan* (“Guidehouse Report”) filed November 6, 2020, in E-01345A-19-0236.

Additionally, APS was ordered to file a copy of the proposed new CEOP as well as a list of each recommendation from each of the aforementioned reports and the actions that APS has taken or intends to take to address each recommendation. Finally, Staff was ordered to file a Staff Report and Proposed Order recommending whether the Commission should approve the proposed CEOP with or without any proposed modifications.

Pursuant to Decision No. 78317, APS hosted two workshops on December 9 and 29, 2021, to discuss input and feedback received from stakeholders which included Staff, Arizona Public Interest Research Group (“Arizona PIRG”), Earthjustice, Valley Interfaith Project, Steve Neil, Southwest Energy Efficiency Project (“SWEEP”), RUCO, Federal Executive Agencies, St. Vincent de Paul, Electric Vehicle Fast-Charging Network (“EVgo”), American Association of Retired Persons (“AARP”) and Wildfire.

STAFF ANALYSIS AND RECOMMENDATIONS

On January 7, 2022, APS filed its proposed CEOP pursuant to Decision No. 78317. The CEOP includes the following sections:

- 1) Introduction;
- 2) Resources and research used in the development of the CEOP. This section includes the research conducted by IBM Consulting ("IBM") on behalf of APS that investigated the industry best practices related to customer education in order to provide a background for the presentation of customer communication materials, the research APS did itself through several customer studies and the numerous stakeholder workshops conducted by APS and IBM in order to collect direct customer feedback.¹ Additionally, APS holds regular meetings with a Consumer Work Group and Customer Advisory Board. Following the issuance of Decision No. 78317, further stakeholder meetings were held by APS in order to collect and process initial and subsequent feedback to the initial drafts of the CEOP prior to the final proposed CEOP version being filed;
- 3) Responses to the recommendations made in the four consultant reports mentioned previously. (See Staff's discussion below);
- 4) The scope of the CEOP to include educational efforts designed to help customers understand the specific changes as a result of Decision No. 78317 and the continuing customer communication education program for such aspects as plan comparison and selecting the most economical plan;
- 5) An overview of APS's communication methodology and communication channels;
- 6) The various "Focus Areas" of the CEOP which are listed and described in further detail below; and
- 7) The measurement and evaluation of the metrics APS plans to use to understand what customer education tools are working and what areas will need to be improved. These metrics include a rate education tracking study composed of periodic baseline surveys of APS customers; customer engagement metrics such as measuring email open and click through rates, website traffic, complaints and most economical plan statistics, and J.D. Power customer awareness and satisfaction metrics.

¹ Decision No. 77270 required APS to "[o]rganize a stakeholder group to collaborate and suggest better ways to communicate the impact of rate changes to residential customers and to educate customers on how to reduce energy consumption." The stakeholder workshops were a series of meetings between APS and this group, the participants of whom included such organizations as RUCO, Wildfire and SWEEP. The stakeholder group addressed such issues as rate plan names.

Consultant Report Recommendations

APS provided the responses to all of the consultant recommendations. However, Staff recommends one modification as discussed below.

Alexander Recommendation 3.4. – Frequency and type of complaints. APS indicates in its response that it will monitor Commission complaints for content but makes no mention of complaints received from its Care Center, the Attorney General's Office, the Better Business Bureau or any other source. On page 49 of the CEOP, in the last bullet point under Care Center metrics, APS does mention monitoring customer feedback from the Care Center similar to ACC complaints but stops short of actually using the word "complaints" and also indicates complaints will be monitored for content. Staff recommends that the CEOP be modified to reflect that, as a Measurement and Evaluation metric, APS will track and report the number and type of complaints from each and all sources.

Focus Areas

APS included six Focus Areas as part of its CEOP. They are:

- New Time-of-Use Hours and Education
- Plan Change Education and Confirmation Process
- Bill Redesign
- Plan Comparison Education and Most Economical Plan Communications
- General Rate Plan Education
- Adjustors

The first three Focus Areas are plans to educate customers on the changes resulting from Decision No. 78317 with the rest devoted to ongoing rate education. These areas include sections detailing the customer insights and preferences APS has gathered from its IBM and work group research as well as the target audience, objectives and channels APS plans to use for customer communication.

Overall, Staff finds that the CEOP Focus Area plans APS has detailed are appropriate and should achieve a sufficient level of education to minimize customer confusion. However, Staff makes the following recommendations.

First, Staff recommends that APS should look at ways it can use text as a communication channel in its roll out of the new Time-of-Use ("TOU") hours and bill design. While APS indicates that its research found that customers would prefer change notification come in the form of an email or on the bill, it also included a number of other communication channels in its TOU notification plans. APS has the ability to use text as a means of notification, as it currently uses it to notify customers about usage and billing alerts, and text notification should be regarded as a means of "heads up" communication for the "New Time-of-Use Hours and Education" and "Bill Redesign" Focus Areas.

Second, in regard to the type of confirmation sent to the customer after the customer switches plans over the phone with the assistance of an APS advisor, Staff recommends that APS give the customer several options. APS indicates a letter will be sent but, for example, a customer may prefer an email.

Other Staff Recommendations

While there are many references in this CEOP being tailored to the requirements found in Decision No. 78317, APS should use this CEOP as a template for requirements that may arise from future APS rate case decisions as well as an ongoing guide for overall customer education. Also, as the CEOP is a dynamic document and will undoubtedly need to be modified based on the experience APS gains by implementing it and working through the various processes with customers, Staff recommends that APS refile the CEOP in six months in this docket with changes or updates made in redline format for Staff review.

Additionally, Staff recommends that APS discontinue filing its Quarterly Rate Plan Education and Outreach Report ("Report") in Docket No. E-01345A-19-0003 and instead file the Report in this docket for a period of three years. In the Report, APS should continue to include the same information it has been reporting about up to this point as well as any additional metric data collected.

Finally, Staff recommends the Commission approve the proposed CEOP with the modifications recommended herein by Staff.

A handwritten signature in blue ink, appearing to read "Abinah", with a stylized flourish at the end.

Elijah O. Abinah
Director
Utilities Division

EOA:MAC:elr\MAS

ORIGINATOR: Matt Connolly

THE COMMISSION

March 29, 2022

Page 6

On this 29th day of March, 2022, the foregoing document was filed with Docket Control as a Utilities Division Memorandum & Proposed Order, and copies of the foregoing were mailed on behalf of the Utilities Division to the following who have not consented to email service. On this date or as soon as possible thereafter, the Commission's eDocket program will automatically email a link to the foregoing to the following who have consented to email service.

Adam Stafford
Western Resource Advocates
Post Office, Box 30497
Phoenix Arizona 85046
adam.stafford@westernresources.org
gstacy@westernresources.org
steve.michel@westernresources.org
autumn.johnson@westernresources.org
Consented to Service by Email

Albert H Acken
Dickinson Wright PLLC
1850 North Central Avenue, Suite 1400
Phoenix Arizona 85004
bert@ackenlaw.com
aacken@dickinson-wright.com
aacken@jsslaw.com
Consented to Service by Email

Armando Nava
The Nava Law Firm PLLC
1641 East Osborn Road, Suite 8
Phoenix Arizona 85016
Filings@navalawaz.com
Consented to Service by Email

Court Rich
Rose Law Group pc
7144 East Stetson Drive, Suite 300
Scottsdale Arizona 85251
Crich@RoseLawGroup.com
Consented to Service by Email

Jonathan Jones
14324 North 160th Drive
Surprise Arizona 85379
jones.2792@gmail.com
Consented to Service by Email

Daniel Pozefsky
RUCO
1110 West Washington, Suite 220
Phoenix Arizona 85007
procedural@azruco.gov
mhightower@azruco.gov
lwoodall@azruco.gov
dpozufsky@azruco.gov
rdela Fuente@azruco.gov
Consented to Service by Email

David Bender
EARTHJUSTICE
1001 G Street, Northwest,
Suite 1000
Washington District of Columbia
20001
dbender@earthjustice.org
Consented to Service by Email

Fred Lomayesva
Post Office Box 123
Lykotsmovi Arizona 86039
flomayesva@hopi.nsn.us
amignella@hopi.nsn.us
Consented to Service by Email

Garry Hays
Law office of Garry Hays PC
2198 East Camelback Road, Suite 230
Phoenix Arizona 85016
Ghays@lawgdh.com
Consented to Service by Email

Giancarlo Estrada
Kamper Estrada, LLP
3030 North 3rd Street, Suite 770
Phoenix Arizona 85012
gestrada@lawphx.com
Consented to Service by Email

Greg Patterson
Munger Chadwick/Competitive
Power Alliance
5511 South Jolly Roger
Tempe Arizona 85283
Greg@azcpa.org
Consented to Service by Email

Gregory M. Adams
515 North 27th Street
Boise Idaho 83702
greg.bass@calpinesolutions.com
Consented to Service by Email

Holly L. Buchanan
AFLOA/JACE-ULFSC
139 Barnes Drive, Suite 1
Tyndall AFB Florida 32403
Holly.buchanan.1@us.af.mil
Consented to Service by Email

Jason Y. Moyes
Moyes Sellers & Hendricks
1850 North Central Avenue, Suite, 1100
Phoenix Arizona 85004
jjw@krsaline.com
jasonmoyes@law-msh.com
jim@harcuvar.com
Consented to Service by Email

Jason R. Mullis
Wood Smith Benning & Berman
LLP
2525 East Camelback Road, Suite, 450
Phoenix Arizona 85016
greg@richardsonadams.com
jmullis@wshblaw.com
greg.bass@calpinesolutions.com
Consented to Service by Email

John B. Coffman
John B. Coffman LLC
871 Tuxedo Boulevard.
St. Louis Missouri 63119
john@johncoffman.net
Consented to Service by Email

John S. Thornton
8008 North Invergordon Road
Paradise Valley Arizona 85253
john@thorntonfinancial.org
Consented to Service by Email

THE COMMISSION

March 29, 2022

Page 7

Karen S White
AFIMSC/JAQ
139 Barnes Avenue
Tyndall AFB Florida 32403
karen.white.13@us.af.mil
Consented to Service by Email

Kimberly A. Dutcher
Navajo Nation Department of
Justice
Post Office Box 2010
Window Rock Arizona 86515
aquinn@nndoj.org
kdutcher@nndoj.org
todd.kimbrough@hklaw.com
Consented to Service by Email

Kurt J. Boehm
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati Ohio 45202
jkylercohn@BKLLawfirm.com
kboehm@bkllawfirm.com
Consented to Service by Email

Marta Darby
Earthjustice
633 17th Street, Suite 1600
Denver Colorado 80202
mdarby@earthjustice.org
Consented to Service by Email

Melissa M. Krueger
Pinnacle West Capital Corporation
400 North 5th Street, Mail Stop
8695
Phoenix Arizona 85004
Thomas.Mumaw@pinnaclewest.com
rodncy.ross@aps.com
ratecase@aps.com
Leland.Snook@aps.com
Melissa.Krueger@pinnaclewest.com
Theresa.Dwyer@pinnaclewest.com
Andrew.Schroeder@aps.com
Consented to Service by Email

Melissa Parham
Zona Law Group P.C.
7701 East Indian School Road,
Suite J
Scottsdale Arizona 85251
melissa@zona.law
scottb@zona.law
attorneys@zona.law
Consented to Service by Email

Nicholas J. Enoch
Lubin & Enoch, PC
349 North Fourth Avenue
Phoenix Arizona 85003
bruce@lubinandenoch.com
nick@lubinandenoch.com
clara@lubinandenoch.com
Consented to Service by Email

Patrick J. Black
Fennemore Craig, P.C.
2394 East Camelback Road, Suite
600
Phoenix Arizona 85016
pblack@fclaw.com
lferrigni@fclaw.com
Consented to Service by Email

Scott F. Dunbar
Keys & Fox, LLP
1580 Lincoln, Suite 880
Denver Colorado 80203
sdunbar@keyesfox.com
Consented to Service by Email

Scott S. Wakefield
Hinton Curry, P.L.L.C.
5045 North 12th Street, Suite 110
Phoenix Arizona 85014-3302
Stephen.Chriis@walmart.com
swakefield@hclawgroup.com
Consented to Service by Email

Shelly A. Kaner
8831 West Athens Street
Peoria Arizona 85382

Thomas Harris
Distributed Energy Resource
Association (DERA)
5215 East Orchid Lane
Paradise Valley Arizona 85253
Thomas.Harris@DERA-AZ.org
Consented to Service by Email

Richard Gayer
526 West Wilshire Drive
Phoenix Arizona 85003
rgayer@cox.net
Consented to Service by Email

Todd F. Kimbrough
Balch & Bingham LLP
919 Congress Avenue, Suite 1110
Austin Texas 78701

Robert A Miller
12817 West Ballad Drive
Sun City West Arizona 85378-5375
rdjscw@gmail.com
Bob.miller@porascw.org
Consented to Service by Email

Timothy M. Hogan
Arizona Center for Law In The
Public
Interest
352 East Camelback Road.,
Suite 200
Phoenix Arizona 85012
janderson@aclpi.org
cpotter@swenergy.org
ezuckerman@swenergy.org
rose.monahan@sierraclub.org
thogan@aclpi.org
Sandy.bahr@sierraclub.org
czwick@wildfireaz.org
brendon@gabelassociates.com
briana@votesolar.org
sbatten@aclpi.org
louisa.eberle@sierraclub.org
miriam.raffel-smith@sierraclub.org
Consented to Service by Email

Robin Mitchell
Director/Chief Counsel, Legal
Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix Arizona 85007
legaldiv@azcc.gov
utildivservicebyemail@azcc.gov
Consented to Service by Email

By:



Edna Luna Reza
Administrative Support
Specialist

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 LEA MÁRQUEZ PETERSON

Chairwoman

3 SANDRA D. KENNEDY

Commissioner

4 JUSTIN OLSON

Commissioner

5 ANNA TOVAR

Commissioner

6 JIM O'CONNOR

Commissioner

7 IN THE MATTER OF THE APPLICATION)
8 OF ARIZONA PUBLIC SERVICE)
COMPANY FOR A HEARING TO)
9 DETERMINE THE FAIR VALUE OF THE)
UTILITY PROPERTY OF THE COMPANY)
10 FOR RATEMAKING PURPOSES, TO FIX A)
JUST AND REASONABLE RATE OF)
11 RETURN THEREON, TO APPROVE RATE)
SCHEDULES DESIGNED TO DEVELOP)
12 SUCH RETURN.)

DOCKET NO. E-01345A-19-0236

DECISION NO. _____

ORDER

**STAFF'S RECOMMENDATION RE-
GARDING ARIZONA PUBLIC SER-
VICE COMPANY'S CUSTOMER EDU-
CATION AND OUTREACH PLAN**

13
14 Open Meeting
April 12 and 13, 2022
15 Phoenix, Arizona

16 BY THE COMMISSION:

17 FINDINGS OF FACT

18 **Background**

19 1. Pursuant to Decision No. 76295, dated August 18, 2017, in Docket No. E-01345A-
20 16-0036, the Arizona Corporation Commission ("ACC" or "Commission") approved a Customer
21 Education and Outreach Plan ("CEOP") for Arizona Public Service Company ("APS" or
22 "Company") to educate its customers on a new, modernized rate. Based on feedback received by
23 the Commission, Utilities Division Staff ("Staff") was directed to investigate the implementation of
24 the CEOP to determine whether the dissemination of the information was delivered by APS to its
25 customers in a reasonable and comprehensive manner. Pursuant to Decision No. 77270, dated June
26 27, 2019, in Docket No. E-01345A-19-0003, the Commission found that "[i]t is reasonable for APS
27 to fund and organize along with the assistance of an independent third-party consultant, a stakeholder
28 group to collaborate and suggest better ways to communicate the impact of changes and adjustor

1 mechanisms to residential customers, including more effective ways to educate customers on rate
2 plans and ways to cut back on energy usage" and "...that APS be required to file a new rate case no
3 later than October 31, 2019."

4 2. The Commission, in Decision No. 78317, issued on November 9, 2021, required APS
5 to work collaboratively with Staff, the Residential Utility Consumer Office ("RUCO"), and any
6 other interested parties on a CEOP that addresses the recommendations made in the following four
7 consultant reports that examined the various aspects of APS's customer education efforts.

- 8 • *Rate Review and Customer Outreach Program Evaluation of Arizona Public*
9 *Service Company* ("Overland Report") filed June 4, 2019, in Docket No. E-
10 01345A-19-0003.
- 11 • *An Evaluation of Arizona Public Service Customer Education Plan and Its*
12 *Implementation* ("Alexander Report") filed May 19, 2020, in Docket Nos. E-
13 01345A-19-0003 and E-01345A-19-0236.
- 14 • *Analysis of the APS Rate Comparison Tools* ("Energytools Report") filed
15 August 20, 2020, in Docket No. E-01345A-19-0003.
- 16 • *Review of the 2017 Customer Education and Outreach Plan & Response to*
17 *the Plan* ("Guidehouse Report") filed November 6, 2020, in E-01345A-19-
18 0236.

19 3. Additionally, APS was ordered to file a copy of the proposed new CEOP as well as
20 a list of each recommendation from each of the aforementioned reports and the actions that APS has
21 taken or intends to take to address each recommendation. Finally, Staff was ordered to file a Staff
22 Report and Proposed Order recommending whether the Commission should approve the proposed
23 CEOP with or without any proposed modifications.

24 4. Pursuant to Decision No. 78317, APS hosted two workshops on December 9 and 29,
25 2021, to discuss input and feedback received from stakeholders which included Staff, Arizona Public
26 Interest Research Group ("Arizona PIRG"), Earthjustice, Valley Interfaith Project, Steve Neil,
27 Southwest Energy Efficiency Project ("SWEEP"), RUCO, Federal Executive Agencies, St. Vincent
28 de Paul, Electric Vehicle Fast-Charging Network ("EVgo"), American Association of Retired
Persons ("AARP") and Wildfire.

Staff Analysis and Recommendations

5. On January 7, 2022, APS filed its proposed CEOP pursuant to Decision No. 78317.

The CEOP includes the following sections:

- 1) Introduction;
- 2) Resources and research used in the development of the CEOP. This section includes the research conducted by IBM Consulting ("IBM") on behalf of APS that investigated the industry best practices related to customer education in order to provide a background for the presentation of customer communication materials, the research APS did itself through several customer studies and the numerous stakeholder workshops conducted by APS and IBM in order to collect direct customer feedback.¹ Additionally, APS holds regular meetings with a Consumer Work Group and Customer Advisory Board. Following the issuance of Decision No. 78317, further stakeholder meetings were held by APS in order to collect and process initial and subsequent feedback to the initial drafts of the CEOP prior to the final proposed CEOP version being filed;
- 3) Responses to the recommendations made in the four consultant reports mentioned previously. (See Staff's discussion below);
- 4) The scope of the CEOP to include educational efforts designed to help customers understand the specific changes as a result of Decision No. 78317 and the continuing customer communication education program for such aspects as plan comparison and selecting the most economical plan;
- 5) An overview of APS's communication methodology and communication channels;
- 6) The various "Focus Areas" of the CEOP which are listed and described in further detail below; and
- 7) The measurement and evaluation of the metrics APS plans to use to understand what customer education tools are working and what areas will need to be improved. These metrics include a rate education tracking study composed of periodic baseline surveys of APS customers; customer engagement metrics such as measuring email open and click through rates, website traffic, complaints and most economical plan statistics, and J.D. Power customer awareness and satisfaction metrics.

¹ Decision No. 77270 required APS to "[o]rganize a stakeholder group to collaborate and suggest better ways to communicate the impact of rate changes to residential customers and to educate customers on how to reduce energy consumption." The stakeholder workshops were a series of meetings between APS and this group, the participants of whom included such organizations as RUCO, Wildfire and SWEEP. The stakeholder group addressed such issues as rate plan names.

Consultant Report Recommendations

6. APS provided the responses to all of the consultant recommendations. However, Staff recommends one modification as discussed below.

7. Alexander Recommendation 3.4. – Frequency and type of complaints. APS indicates in its response that it will monitor Commission complaints for content but makes no mention of complaints received from its Care Center, the Attorney General's Office, the Better Business Bureau or any other source. On page 49 of the CEOP, in the last bullet point under Care Center metrics, APS does mention monitoring customer feedback from the Care Center similar to ACC complaints but stops short of actually using the word "complaints" and also indicates complaints will be monitored for content. Staff recommends that the CEOP be modified to reflect that, as a Measurement and Evaluation metric, APS will track and report the number and type of complaints from each and all sources.

Focus Areas

8. APS included six Focus Areas as part of its CEOP. They are:

- New Time-of-Use Hours and Education
- Plan Change Education and Confirmation Process
- Bill Redesign
- Plan Comparison Education and Most Economical Plan Communications
- General Rate Plan Education
- Adjustors

9. The first three Focus Areas are plans to educate customers on the changes resulting from Decision No. 78317 with the rest devoted to ongoing rate education. These areas include sections detailing the customer insights and preferences APS has gathered from its IBM and work group research as well as the target audience, objectives and channels APS plans to use for customer communication.

10. Overall, Staff finds that the CEOP Focus Area plans APS has detailed are appropriate and should achieve a sufficient level of education to minimize customer confusion. However, Staff makes the following recommendations.

11. First, Staff recommends that APS should look at ways it can use text as a communication channel in its roll out of the new Time-of-Use ("TOU") hours and bill design. While APS indicates that its research found that customers would prefer change notification come in the form of an email or on the bill, it also included a number of other communication channels in its TOU notification plans. APS has the ability to use text as a means of notification, as it currently uses it to notify customers about usage and billing alerts, and text notification should be regarded as a means of "heads up" communication for the "New Time-of-Use Hours and Education" and "Bill Redesign" Focus Areas.

12. Second, in regard to the type of confirmation sent to the customer after the customer switches plans over the phone with the assistance of an APS advisor, Staff recommends that APS give the customer several options. APS indicates a letter will be sent but, for example, a customer may prefer an email.

Other Staff Recommendations

13. While there are many references in this CEOP being tailored to the requirements found in Decision No. 78317, APS should use this CEOP as a template for requirements that may arise from future APS rate case decisions as well as an ongoing guide for overall customer education. Also, as the CEOP is a dynamic document and will undoubtedly need to be modified based on the experience APS gains by implementing it and working through the various processes with customers, Staff recommends that APS refile the CEOP in six months in this docket with changes or updates made in redline format for Staff review.

14. Additionally, Staff recommends that APS discontinue filing its Quarterly Rate Plan Education and Outreach Report ("Report") in Docket No. E-01345A-19-0003 and instead file the Report in this docket for a period of three years. In the Report, APS should continue to include the same information it has been reporting about up to this point as well as any additional metric data collected.

15. Finally, Staff recommends the Commission approve the proposed CEOP with the modifications recommended herein by Staff.

CONCLUSIONS OF LAW

1
2 1. Arizona Public Service Company is an Arizona public service corporation within the
3 meaning of Article XV, Section 2 of the Arizona Constitution.

4 2. The Commission has jurisdiction over Arizona Public Service Company and over the
5 subject matter of this docket.

6 3. The Commission, having reviewed the filing and Staff's Memorandum concludes
7 that it is in the public interest to approve Arizona Public Service Company's Customer Education
8 and Outreach Plan as proposed and discussed herein.

ORDER

9
10 IT IS THEREFORE ORDERED that the Customer Education and Outreach Plan filed by
11 Arizona Public Service Company in this Docket be approved with the Staff modifications listed in
12 Findings of Fact Nos. 5, 8 and 9.

13 IT IS FURTHER ORDERED that Arizona Public Service Company refile the Customer
14 Education and Outreach Plan six months from the effective date of this Order in this docket with
15 changes or updates made in redline format for Staff review.

1 IT IS FURTHER ORDERED that Arizona Public Service Company cease filing its Quarterly
2 Rate Plan Education and Outreach Report in Docket No. E-01345A-19-0003 and instead file the
3 Report in this docket for a period of three years. In the Quarterly Rate Plan Education and Outreach
4 Report, Arizona Public Service Company will continue to include the same information it has been
5 reporting about up to this point as well as any and all metric data collected as described in pages 46
6 through 50 of the Customer Education and Outreach Plan or included in Staff's recommendations.

7 IT IS FURTHER ORDERED that this Decision shall become effective immediately.

8
9 **BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION**

10
11 _____
12 CHAIRWOMAN MARQUEZ PETERSON

COMMISSIONER KENNEDY

13
14 _____
15 COMMISSIONER OLSON

COMMISSIONER TOVAR

COMMISSIONER O'CONNOR

16 IN WITNESS WHEREOF, I, MATTHEW J. NEUBERT,
17 Executive Director of the Arizona Corporation Commission,
18 have hereunto, set my hand and caused the official seal of this
19 Commission to be affixed at the Capitol, in the City of
20 Phoenix, this _____ day of _____, 2022.

21 _____
22 MATTHEW J. NEUBERT
23 EXECUTIVE DIRECTOR

24 DISSENT: _____

25 DISSENT: _____

26 EOA:MAC:elr /MAS
27
28

Arizona Public Service Company
Docket No. E-01345A-19-0236

Adam Stafford
Western Resource Advocates
Post Office, Box 30497
Phoenix Arizona 85046
adam.stafford@westernresources.org
stacy@westernresources.org
steve.michel@westernresources.org
autumn.johnson@westernresources.org
Consented to Service by Email

Albert H Acken
Dickinson Wright PLLC
1850 North Central Avenue, Suite 1400
Phoenix, Arizona 85004
bert@ackenlaw.com
aacken@dickinson-wright.com
aacken@jsslaw.com
Consented to Service by Email

Armando Nava
The Nava Law Firm PLLC
1641 East Osborn Road, Suite 8
Phoenix, Arizona 85016
Filings@navalawaz.com
Consented to Service by Email

Court Rich
Rose Law Group pc
7144 East Stetson Drive, Suite 300
Scottsdale, Arizona 85251
Crich@RoseLawGroup.com
Consented to Service by Email

Jonathan Jones
14324 North 160th Drive
Surprise, Arizona 85379
jones.2792@gmail.com
Consented to Service by Email

Daniel Pozefsky
RUCO
1110 West Washington, Suite 220
Phoenix, Arizona 85007
procedural@azruco.gov
mhightower@azruco.gov
lwoodall@azruco.gov
dpozefsky@azruco.gov
rdela Fuente@azruco.gov
Consented to Service by Email

David Bender
EARTHJUSTICE
1001 G Street, Northwest, Suite 1000
Washington District of Columbia 20001
dbender@earthjustice.org
Consented to Service by Email

Fred Lomayesva
Post Office Box 123
Lykotsmovi Arizona 86039
flomayesva@hopi.nsn.us
amignella@hopi.nsn.us
Consented to Service by Email

Garry Hays
Law office of Garry Hays PC
2198 East Camelback Road, Suite 230
Phoenix, Arizona 85016
Ghays@lawgdh.com
Consented to Service by Email

Giancarlo Estrada
Kamper Estrada, LLP
3030 North 3rd Street, Suite 770
Phoenix Arizona 85012
gestrada@lawphx.com
Consented to Service by Email

Greg Patterson
Munger Chadwick/Competitive Power Alliance
5511 South Jolly Roger
Tempe Arizona 85283
Greg@azcpa.org
Consented to Service by Email

Gregory M. Adams
515 North 27th Street
Boise Idaho 83702
greg.bass@calpinesolutions.com
Consented to Service by Email

Holly L. Buchanan
AFLOA/JACE-ULFSC
139 Barnes Drive, Suite 1
Tyndall AFB Florida 32403
Holly.buchanan.1@us.af.mil
Consented to Service by Email

Jason Y. Moyes
Moyes Sellers & Hendricks
1850 North Central Avenue, Suite 1100
Phoenix Arizona 85004
jjw@krsaline.com
jasonmoyes@law-msh.com
jim@harcuvar.com
Consented to Service by Email

Jason R. Mullis
Wood Smith Benning & Berman LLP
2525 East Camelback Road, Suite 450
Phoenix Arizona 85016
greg@richardsonadams.com
jmullis@wshblaw.com
greg.bass@calpinesolutions.com
Consented to Service by Email

John B. Coffman
John B. Coffman LLC
871 Tuxedo Boulevard
St. Louis Missouri 63119
john@johncoffman.net
Consented to Service by Email

John S. Thornton
8008 North Invergordon Road
Paradise Valley Arizona 85253
john@thorntonfinancial.org
Consented to Service by Email

Karen S White
AFIMSC/JAQ
139 Barnes Avenue
Tyndall AFB Florida 32403
karen.white.13@us.af.mil
Consented to Service by Email

Kimberly A. Dutcher
Navajo Nation Department of Justice
Post Office Box 2010
Window Rock Arizona 86515
aquinn@nndoj.org
kdutcher@nndoj.org
todd.kimbrough@hklaw.com
Consented to Service by Email

Kurt J. Boehm
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati Ohio 45202
jkylercohn@BKLlawfirm.com
kboehm@bklawfirm.com
Consented to Service by Email

Marta Darby
Earthjustice
633 17th Street, Suite 1600
Denver Colorado 80202
mdarby@earthjustice.org
Consented to Service by Email

Melissa M. Krueger
Pinnacle West Capital Corporation
400 North 5th Street, Mail Stop 8695
Phoenix Arizona 85004
Thomas.Mumaw@pinnaclewest.com
rodney.ross@aps.com
ratecase@aps.com
Leland.Snook@aps.com
Melissa.Krueger@pinnaclewest.com
Theresa.Dwyer@pinnaclewest.com
Andrew.Schroeder@aps.com
Consented to Service by Email

Melissa Parham
Zona Law Group P.C.
7701 East Indian School Road, Suite
J
Scottsdale Arizona 85251
melissa@zona.law
scottb@zona.law
attorneys@zona.law
Consented to Service by Email

Shelly A. Kaner
8831 West Athens Street
Peoria Arizona 85382
Todd F. Kimbrough
Balch & Bingham LLP
919 Congress Avenue, Suite 1110
Austin Texas 78701
Nicholas J. Enoch
Lubin & Enoch, PC
349 North Fourth Avenue
Phoenix Arizona 85003
bruce@lubinandenoch.com
nick@lubinandenoch.com
clara@lubinandenoch.com
Consented to Service by Email

Patrick J. Black
Fennemore Craig, P.C.
2394 East Camelback Road, Suite
600
Phoenix Arizona 85016
pblack@fclaw.com
lferrigni@fclaw.com
Consented to Service by Email

Scott F. Dunbar
Keys & Fox, LLP
1580 Lincoln, Suite 880
Denver Colorado 80203
sdunbar@keyesfox.com
Consented to Service by Email

Scott S. Wakefield
Hienton Curry, P.L.L.C.
5045 North 12th Street, Suite 110
Phoenix Arizona 85014-3302
Stephen.Chriss@walmart.com
swakefield@hclawgroup.com
Consented to Service by Email

Thomas Harris
Distributed Energy Resource
Association (DERA)
5215 East Orchid Lane
Paradise Valley Arizona 85253
Thomas.Harris@DERA-AZ.org
Consented to Service by Email

Richard Gayer
526 West Wilshire Drive
Phoenix Arizona 85003
rgayer@cox.net
Consented to Service by Email

Robert A Miller
12817 West Ballard Drive
Sun City West Arizona 85378-5375
rdjsw@gmail.com
Bob.miller@porasew.org
Consented to Service by Email

Timothy M. Hlogan
Arizona Center for Law In The
Public
Interest
352 East Camelback Road.,
Suite 200
Phoenix Arizona 85012
janderson@aclpi.org
cpotter@swenergy.org
ezuckerman@swenergy.org
rose.monahan@sierraclub.org
thogan@aclpi.org
Sandy.bahr@sierraclub.org
czwick@wildfireaz.org
brendon@gabelassociates.com
briana@votesolar.org
sbatten@aclpi.org
louisa.eberle@sierraclub.org
miriam.raffel-smith@sierraclub.org
Consented to Service by Email

Robin Mitchell
Director/Chief Counsel, Legal
Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix Arizona 85007
legaldiv@azcc.gov
utildivservicebyemail@azcc.gov
Consented to Service by Email